Iqaluit Nukkiksautiit Project Type “B” Application Comment Responses

Submitted to: Nunavut Water Board

Submitted by: Nunavut Nukkiksautiit Corporation

DFO Review Comments
Contact: Dana Harris – Biologist DFO
DFO File # 26-HCAA-00346
May 8, 2026

CIRNAC Review Comments
Contact: William Quere
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873-452-1981

CIRNAC File # 143851565
May 8, 2026

#	Category	Reference(s)	Comment	DFO Recommendation	Proponent Response
D1	DFO Protective Measures	https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html	In order to comply with the Fisheries Act, it is recommended that the Proponent follow DFO’s protective measures for fish and fish habitat and standard codes of practice which can be found on DFO’s website		The Project team acknowledges DFO’s recommendation. Applicable DFO protective measures for fish and fish habitat, relevant Codes of Practice, and site-specific mitigation measures will be incorporated into the Environmental Protection Plan and communicated to field personnel and contractors before work begins. For activities involving water withdrawal, pumps or intake hoses will be fitted with appropriate end-of-pipe fish protection screens consistent with DFO guidance for small water intakes, where applicable. The Project team will plan in-water activities to respect the applicable Nunavut restricted activity timing windows. Where water withdrawal or other activities may overlap with the restricted activity period, NNC will submit a Request for Review to DFO before undertaking the activity. If the Project causes, or is about to cause, the death of fish by means other than fishing or the harmful alteration, disruption or destruction of fish habitat, NNC will notify DFO at DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca.

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D2	NU In-Water Works Timing Windows	https://www.dfo-mpo.gc.ca/pnw-ppe/timing-periodes/nu-eng.html	Proponents are asked to respect the NU in-water works restricted activity timing windows to protect fish during spawning and incubation periods when spawning fish, eggs and fry are vulnerable to disturbance or sediment.		The Project team acknowledges DFO’s recommendation. The Project team will plan in-water activities to respect the applicable Nunavut restricted activity timing windows. Where water withdrawal or other activities may overlap with the restricted activity period, NNC will submit a Request for Review to DFO before undertaking the activity. These requirements will be incorporated into the Environmental Protection Plan and communicated to field personnel and contractors before work begins.
D3	DFO’s Interim Code of Practice	https://www.dfompo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html	The proponent should refer to DFO’s Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater available at when using fish screens and if the water intake flow is up to 0.150 m3/s, or 150 liters per second (L/s).		The Project team acknowledges DFO’s recommendation. For activities involving water withdrawal, pumps or intake hoses will be fitted with appropriate end-of-pipe fish protection screens consistent with DFO guidance for small water intakes, where applicable. This requirement will be incorporated into the Environmental Protection Plan and communicated to field personnel and contractors before work begins.
D4	Request for Review	https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-003-eng.html https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html	If the proposal meets the criteria for a site-specific review (e.g., withdrawing water during the Restricted Activity Period), as described on DFO’s website they should complete and submit the request for review form available on the website		The water withdrawal will occur from July-October, so it would have 2 months overlap within the Zone 1 restricted activity period. A Request for Review will be submitted which will include the proposed quantity of water to be removed per day.

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D5	Duty to Notify		It is also the proponent’s Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or the destruction of fish habitat. Such notification should be directed to DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca	Notification should be directed to DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca	The Project team acknowledges DFO’s recommendation. Applicable DFO protective measures for fish and fish habitat, relevant Codes of Practice, and site-specific mitigation measures will be incorporated into the Environmental Protection Plan and communicated to field personnel and contractors before work begins. For activities involving water withdrawal, pumps or intake hoses will be fitted with appropriate end-of-pipe fish protection screens consistent with DFO guidance for small water intakes, where applicable. The Project team will plan in-water activities to respect the applicable Nunavut restricted activity timing windows. Where water withdrawal or other activities may overlap with the restricted activity period, NNC will submit a Request for Review to DFO before undertaking the activity. If the Project causes, or is about to cause, the death of fish by means other than fishing or the harmful alteration, disruption or destruction of fish habitat, NNC will notify DFO at DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca.

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R-01	Spill Kits and Hazardous Material Storage Area		Spill kits are mentioned in section 5.2 of the Spill Prevention & Response Plan but it does not detail their locations relative to fuel or hazardous material locations. The concern is that without this description, CIRNAC cannot determine if the kit coverage is adequate for the project.	CIRNAC recommends that spill kit positions and hazardous material storage locations be provided.	The Project team acknowledges CIRNAC’s recommendation. The revised Environmental Protection Plan and Spill Prevention and Response Plan will identify spill kit locations relative to fuel storage, hazardous material storage, refuelling areas, camp infrastructure, drill areas, and nearby water bodies. Fuel, hazardous materials, refuelling, waste storage, and waste handling activities will be located at least 31 m from the ordinary high-water mark of any water body (Figure attached). If this setback cannot be maintained due to field conditions, NNC will consult with the CIRNAC Inspector and/or NWB before proceeding. Fuel will be stored in a designated secondary containment area. Current fuel storage consists of a temporary 4 ft by 10 ft lined containment structure. During previous field work, no more than three 205 L drums were stored in this area at one time. Fuel volumes will be kept to the minimum required for safe operations. Spill kits will be located near fuel storage and handling areas, with portable response materials available at active work areas. Spill response capacity will be scaled to the maximum fuel volume stored on site. Spill kit and fuel/hazardous material storage locations will be shown on the revised site map or updated management plan.

R-02	Fuel management		Elements of a Fuel Management Plan are missing including secondary containment dimensions and materials, location of the designated refueling area, fuel storage conditions and monitoring, spill kit availability, and how fuel will be transported to and around the site. The concern is that without these items, water and the environment at the site are at greater risk.	CIRNAC recommends that a Fuel Management Plan be created for current and future operation of the camp. This is to include how fuel is handled, where it is stored, empty fuel barrel use and disposal, removal schedule for empty fuel barrels, fuel related locations, etc. All fuel activities and storage must be at a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any water body.	The Project team acknowledges CIRNAC’s recommendation. A standalone Fuel Management Plan is not proposed at this time; however, the revised Environmental Protection Plan and Spill Prevention and Response Plan will include a dedicated fuel management section that addresses the information requested by CIRNAC. Fuel will be transported to and around the site in sealed, labelled containers suitable for the fuel type and field conditions. Fuel, hazardous materials, waste storage, refuelling, and waste handling activities will be located at least 31 m from the ordinary high-water mark of any water body. If field conditions identify a constraint that may affect this setback, NNC will consult with the CIRNAC Inspector and/or NWB before proceeding. refuelling will be conducted using drip trays, absorbent materials, and spill response equipment appropriate to the activity. Fuel containers will be inspected regularly for leaks, damage, staining, or other signs of potential release. The designated fuel storage area will include secondary containment suitable for the maximum volume of fuel stored on site. The current fuel storage arrangement is a temporary 4 ft by 10 ft containment structure constructed with lumber and a thick impermeable membrane. The fuel cache will be managed to minimize the quantity of fuel stored on site, and the previous field program did not store more than three 205 L drums in the containment area at one time.

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					Empty fuel drums will be capped, stored upright where practical, inspected, and removed from site on the next available backhaul or at the end of the field program. Empty drums and other fuel-related waste will not be disposed of on site. Fuel storage areas, refuelling areas, empty drum storage areas, and spill kit locations will be shown on the revised site map and described in the updated Environmental Protection Plan and Spill Prevention and Response Plan.

R-03	Sump Location and Filtration Method		The Non-Technical Project Description does not describe the greywater sump location relative to camp and the high water mark of any nearby waterbodies. The document also notes that there will be a primary settling basin with a shallow, lined trench or sump which allows solids and grease to settle out. It is unclear if this first settling basin is located directly on the land which would constitute a spill rather than a separate filtration device. Solids and grease must be removed prior to entering the sump in a manner that does not allow the solids and grease to enter the environment. The concern is that without the location and details on grease and solids filtration, CIRNAC cannot determine the sumps environmental risk.	CIRNAC recommends NNC provide the location relative to water bodies and camp facilities, and filtration information on grease and solids. All sumps must be located a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any water body where direct flow into any water body is not possible. CIRNAC would also note that care should be taken such that wildlife do not enter the sump.	The Project team acknowledges CIRNAC’s recommendation regarding greywater management. The revised Environmental Protection Plan and site map will identify the location of the greywater management area relative to the camp and nearby water bodies, including 31 m from the ordinary high-water mark. Based on the current camp setup, greywater will be managed through a contained greywater holding system, and a land-based sump discharge is not proposed. Greywater will be managed using a contained greywater holding system rather than being discharged directly to the land surface. The greywater containment unit will be located at least 31 m from the ordinary high-water mark of any water body and positioned so that direct flow to any water body is not possible. The containment unit will be inspected and cleaned out regularly during camp operations and fully cleaned and removed during demobilization. Kitchen greywater will be managed to reduce the release of food particles, grease, oils, and solids. Food solids and grease will be removed before greywater enters the containment unit, using screened containers, grease traps, or an equivalent separation method. Captured solids and grease will be collected and disposed of with camp waste at an approved facility. Food waste, grease, and other wildlife attractants will not be discharged to the greywater containment system. The greywater management area will be monitored for signs of wildlife activity, leaks, odours, improper drainage, or accumulation of solids. If required, temporary covers,

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					barriers, signage, or other controls will be used to discourage wildlife access.

R-04	Waste Management		Waste management is unclear in areas throughout the nontechnical summary as well as the General Application itself. It is unclear where waste from the outhouses will be stored as well as to how and when it will be removed from the pit. While food waste is said to be stored securely in a storage tent, it is unclear where any other waste mentioned in the General Application will be stored, transported out, or their distance from water.	CIRNAC recommends the applicant provide the methods and processes for collecting, storing, treating and discharging their waste. This is to include waste not listed in their application such as solid waste (ie Paper, plastic, wood, burlap, food wastes) and bulky items (such as empty drums). Indicate the capacity of these storages as well as there location relative to the camp and nearby waterbodies. Waste management activities must be a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any water body. As this will be an ongoing project, CIRNAC recommends a Waste Management Plan be created prior to commencement of the project.	The Project team acknowledges CIRNAC’s recommendation. A standalone Waste Management Plan is not proposed at this time; however, the revised Environmental Protection Plan will include a dedicated waste management section that describes waste collection, storage, handling, transportation, and disposal procedures for camp and field activities. Solid waste, including paper, plastic, food packaging, wood, burlap, and other domestic or camp waste, will be collected in designated containers and stored in a secure manner to reduce wildlife attraction and prevent windblown debris. Food waste will be stored separately in secure containers or within a designated waste storage area and removed from site for disposal at an approved facility. Human waste, urine, and sewage-related waste will be collected and transported to an approved receiving facility in Iqaluit. These materials will not be discharged to land or water at the Project site. Bulky waste, including empty drums, construction materials, and damaged equipment, will be stored in designated areas and removed from site by backhaul or during demobilization. Empty drums will be capped, stored securely, and removed from site for reuse, recycling, or disposal at an approved facility. Waste storage and handling areas will be located at least 31 m from the ordinary high-water mark of any water body. If field conditions identify a constraint that may affect this setback, NNC will consult with the CIRNAC

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					Inspector and/or NWB before proceeding. Waste storage locations, greywater containment, fuel storage, and camp infrastructure will be shown on the revised site map. Waste will be removed from site regularly during operations, as needed, and at the end of each field season. No waste will be disposed of on site.

R-05	Final Closure		Section 3.1.9 of the abandonment and restoration plan states “Upon completion of abandonment and restoration activities, a final inspection of the site will be conducted to verify that all Project components have been removed and that no environmental hazards remain. This inspection will be carried out by the Project team and will include confirmation that closure objectives have been achieved. Photo documentation of site conditions will be collected to support verification of restoration activities. A summary of demobilization and restoration activities may be prepared for submission to regulators, if required. Supporting documentation will be compiled and retained, including waste manifests, disposal records, spill/incident reports, and any corrective actions undertaken. These records will be maintained to demonstrate compliance with approved procedures and to support regulatory review if requested.” The concern is that these abandonment and restorative activities with documentation should be regularly submitted to the NWB and CIRNAC.	CIRNAC recommends NNC provide the documentation collected for progressive and final reclamation to be submitted with annual reports or as requested by regulators. Further, for final closure, CIRNAC would recommend that areas of disturbed vegetation, including those at the camp, fuel caches, and drill sites, be photographed and managed in consultation with the CIRNAC Inspector.	The Project team acknowledges CIRNAC’s recommendation. NNC will revise the Abandonment and Restoration Plan to state that documentation associated with progressive reclamation and final closure activities will be submitted with annual reports or otherwise provided to the NWB and CIRNAC upon request. Closure documentation will include, as applicable, photographs of disturbed areas before and after reclamation, records of camp demobilization, waste manifests, disposal records, spill or incident reports, corrective actions, and confirmation that temporary infrastructure, wastes, fuel storage materials, and ancillary equipment have been removed from site. During final closure, disturbed areas associated with the camp, fuel cache, greywater containment area, drill sites, and other temporary work areas will be photographed and managed in consultation with the CIRNAC Inspector, as appropriate. Post-closure inspection and monitoring will be completed where required to confirm that disturbed areas are stable and that no residual environmental hazards remain.

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R-06	Timeline discrepancies		In the Non-Technical Summary, the stated timeline for camp is “A 30-person temporary base camp will be established near the head of the unnamed lake. It will be active beginning in May 2026 to mid-October of 2026.” While the Abandonment and Restoration plan states the timeline as “To support the continued investigative field programs, NNC will re-establish a 30- person temporary base camp near the head of the unnamed lake. It will be active beginning in June 2026 to mid-October 2026 and June 2027 to mid-October 2027.” Understanding that this is intended to be a long term project, the concern is that the timeline and ongoing activities remain unclear.	CIRNAC recommends the applicant clarify the timelines relevant to current work under this Type B licence application that they are currently aware of and ensure future submissions provide the same consistency.	The Project team acknowledges the discrepancy between the timelines presented in the Non-Technical Summary and the Abandonment and Restoration Plan. The timeline presented in the Abandonment and Restoration Plan reflects the most current Project information and supersedes the timeline provided in the earlier Non-Technical Summary. The current anticipated schedule for the temporary 30-person base camp is June to mid-October 2026 and from June to mid-October 2027. Set-up of the camp will occur in June and will be operational in July. Camp activities are intended to support seasonal investigative and field programs associated with the Project and do not represent continuous year-round occupancy.

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R-07	Financial Information		The general application, section 22, requires NNC to “Provide a statement of financial responsibility. If the applicant is a business entity, provide a list of the officers of the company. If the applicant is a business entity attach a copy of the Certificate of Incorporation or evidence of registration of the company name”. The concern is these items were not provided and are necessary for review	CIRNAC recommends NNC provide the required financial information.	NNC confirms that it accepts financial responsibility for the activities proposed under this Type B Water Licence application, including implementation of applicable mitigation, monitoring, spill response, waste management, demobilization, and reclamation requirements associated with the undertaking. A copy of the Certificate of Inuit Firm Status is provided with this response package. The officers of the company are listed below. The names of the officers of the company are: Tommy Akavak Harry Flaherty Peter Keenainak Matthew Alainga Joe Kunuk Blandina Tulugarjuk Anne Curley

R-08	Security Information		The general application in section 21 requires NNC to “Provide an estimate of the total financial security for final reclamation equal to the total outstanding reclamation liability for land and water combined sufficient to cover the highest liability over the life of the undertaking. Estimates of reclamation costs must be based on the cost of having the necessary reclamation work done by a third party contractor if the operator defaults. The estimate must also include contingency factors appropriate to the particular work to be undertaken. Where applicable, the financial security assessment should be prepared in a manner consistent with the principals respecting mine site reclamation and implementation found in the Mine Site Reclamation Policy for Nunavut, Indian and Northern Affairs Canada, 2002”. The concern is that the provided answer does not meet this requirement as no estimate was given.	CIRNAC recommends NNC provide the required security information.	The Project team acknowledges CIRNAC’s recommendation. NNC has prepared an estimate of the total financial security for final reclamation based on the cost of a third-party contractor completing the necessary reclamation work in the event of operator default. The estimate is intended to address the highest expected reclamation liability over the life of the undertaking for the temporary camp and associated field investigation activities. Final reclamation activities are expected to include demobilization and removal of the temporary camp and ancillary infrastructure; clean-up and removal of the greywater containment unit; removal of solid waste, urine, sewage-related waste, empty drums, fuel storage materials, and other camp-related waste for disposal at approved facilities; remediation of fuel handling and storage areas, if necessary; grading and stabilization of disturbed areas; erosion and sediment control measures, if required; restoration of disturbed ground surfaces, where practical; borehole closure or stabilization measures, as required; and post-closure inspection, photographic documentation, and monitoring, where applicable. The current estimate is as follows: - Demobilization and removal of the temporary camp and ancillary infrastructure, including camp clean-up, waste removal, greywater containment clean-up, fuel storage area clean-up, and removal of temporary materials: $135,000 - Borehole-related closure/stabilization items, based on three crew shifts: $14,550

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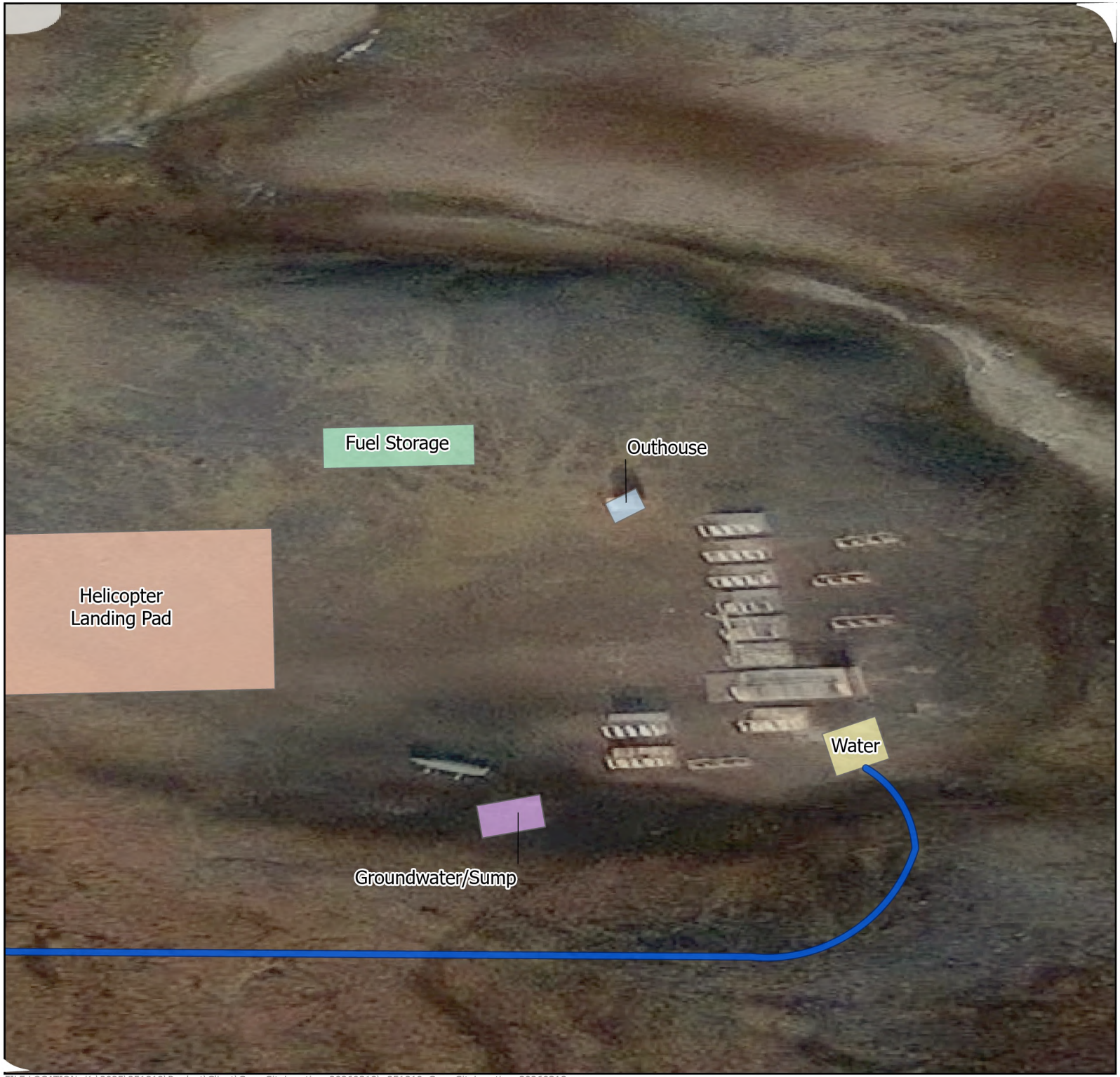
					Subtotal: $149,550 A 20% contingency has been applied to account for uncertainty, remote logistics, weather delays, and potential minor additional stabilization or clean-up requirements. Contingency: $29,910 Estimated total financial security: $179,460 This estimate is based on currently available information and will be updated if final geotechnical-specific costs materially change, if additional reclamation activities are identified, or if required by the NWB or CIRNAC Inspector. Verification of borehole closure and related quality assurance/quality control documentation will be completed as part of the drilling program and retained with project records. Closure documentation, including photographs, waste disposal records, and inspection records, will be submitted with annual reporting or provided upon request by regulators.
R-09	Studies Undertaken to Date		Section 23 of the general application requires the applicant to “List and attach copies of studies, reports, research, etc”. The concern is that while studies were listed, they were not attached to the application.	CIRNAC recommends NNC provide the required studies.	NNC acknowledges CIRNAC’s recommendation. Copies of the studies, reports, and research materials listed in the application are provided with this response package, where available. The 2025 Annual Report submitted to NIRB is also included and provides a summary of field studies and reporting completed to date. If any listed study or report is not included as a standalone attachment, NNC will identify where the information is contained within the attached annual report or supporting documentation.



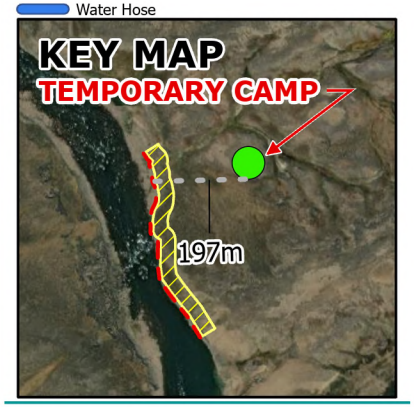
NUNAVUT NUKKIKSAUTIIT CORPORATION

IQALUIT
NUKKIKSAUTIIT PROJECT

TEMPORARY CAMP LAYOUT

FIGURE 9

- High Water Mark
- Camp Location to High Water Mark (197m)
- High Water Mark Setback (31m)
- Fuel Storage
- Groundwater/Sump
- Helicopter Landing Pad
- Outhouse
- Water
- Water Hose



MAP DRAWING INFORMATION
DATA PROVIDED BY: ESRI, DILLON CONSULTING LTD, NUNAVUT NUKKIKSAUTIIT CORPORATION, GOVERNMENT OF NUNAVUT, NATURAL RESOURCES CANADA, DILLON CONSULTING LIMITED, ECOLOGIC CONSULTANTS LIMITED, ESRI

MAP CREATED BY: -EES
MAP CHECKED BY: -MR
MAP PROJECTION: GCS North American 1983 CSRS

DILLON CONSULTING

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PROJECT:25-1319
STATUS: DRAFT
DATE: 2026-05-14

FILE LOCATION: K:\2025\251319\Product\Client\CampSiteLocation_20260318\p251319_CampSiteLocation_20260318.aprx

IFR No. 0928

CERTIFICATE OF INUIT FIRM STATUS

Nunavut Tunngavik Incorporated hereby certifies that

Nunavut Nukkiksautiit Corporation

is an Inuit firm pursuant to Article 24 of the

Nunavut Agreement

1/12/26

Tim Brown
Director, Inuit Firm Secretariat

This Certificate is valid from January 12, 2026 to December 31, 2026

Inuit Ownership Level: Class 3

(Class III: 100%; Class II: above 76% & below 100%; Class I: above 51% & below 76%)